

Exhibit B



Deposition of:
Shanice Matthews

August 7, 2017

In the Matter of:
**In Re: Bard IVC Filters Products
Liability**

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1 IN THE UNITED STATES DISTRICT COURT

2 FOR THE DISTRICT OF ARIZONA

3

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5 In re Bard IVC Filters NO. MD-15-02641

6 Products Liability PHX-DGC

7 Litigation

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VIDEOTAPED DEPOSITION OF

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SHANICE MATTHEWS

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August 7, 2017 - 12:54 p.m.

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Double Tree by Hilton

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50 Y. Johnson Hagins Drive

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Savannah, Georgia

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Deborah K. Lingonis, RPR, CCR 2883

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1 MR. COMBS: Is that a no?

2 THE WITNESS: Oh, I'm sorry, no, sir. I'm
3 sorry.

4 BY MR. HOM:

5 Q. It's all right. How often does your mother
6 smoke?

7 A. Not often.

8 Q. Okay. Can you give me a ballpark?

9 A. She probably smokes like one cigarette a
10 day.

11 Q. Okay. How about drinking?

12 A. Oh, no. No, sir.

13 Q. Has she been diagnosed with any other health
14 conditions that you're aware of?

15 A. No, sir. Not that I'm aware of.

16 Q. Has she been in any accidents?

17 A. No, sir.

18 Q. Do you know the last time your mother went to
19 the doctor?

20 A. Not that I remember.

21 Q. So would the last doctor visit you're aware of
22 be the trip you mentioned earlier when she discovered
23 the fractured strut?

24 A. Uh-huh, and then when she went back. Like,
25 that was in 2010, though, and then when she went back